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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

VIA FAX AND REGULAR MAIL

APR 08 1994

Mr. James F. Harris, Project Manager
Atlantic Division, Code 1822
NAVFACENGCOM
1510 Gilbert Street
Norfolk, VA 23511-2699

RE: Toxicological Comments for sites 1, 2B and 2C

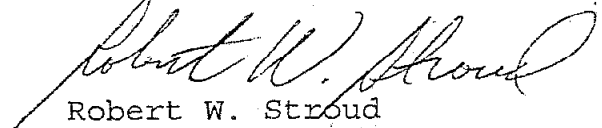
Dear Mr. Harris:

EPA has completed it's toxicological review of the workplan addendum for sites 1, 2B, and 2C. The following comments address exposure scenarios and risk based cleanup goals.

1. Proposed risk-based cleanup goals must be derived using a residential exposure scenario for groundwater if the underlying aquifer could potentially be used for potable water (Class 1 or 2). For on-site soils, a residential exposure scenario and a groundwater protection scenario should also be used to derive a cleanup level. A cleanup level based on an industrial-use scenario can be presented but it must be in addition to the above cleanup goals, not instead of them.
2. Additional chemicals of concern that may be warranted for these three sites include benzene (site 1), trans-1,2-dichloroethene and benzene (site 2B), and trans-1,2-dichloroethene and 1,1-dichloroethene (site 2C). As noted in the revised workplan, the final chemical of concern determination can be made following the receipt of the latest round of sample results. It is not clear on p. 3-16 whether constituents presently above health based concentrations will be considered for inclusion as chemicals of concern; however, site related chemicals that are presently above health based concentrations should always be considered for inclusion in COCs.
3. Groundwater sampling for site 2C on p. 3-11 notes that aromatic volatiles will be analyzed by the mobile laboratory only if the CMS field investigation of the Phase II RFI sites 2D and 15. Because low levels of benzene were measured in a number of groundwater samples at this site, steps should be taken to insure future samples include analysis for this constituent.

As stated in Section F, paragraph XIV of the consent order, Oceana will have 60 days of receipt of this letter to respond to these comments. If you have any questions or concerns regarding the comments or any other issues related to the Oceana project, please contact me at (215) 597-6688.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert W. Stroud".

Robert W. Stroud
RCRA Project Manager

cc: Nina Johnson (LANTDIV)
Will Bullard (NAS Oceana)
Erica Dameron (VADEQ)